



Reporting of Suspicious and/or Fraudulent Activities



Policy A-HR-21

October 14, 2013

Purpose: To protect the agency, its operations, employees, and assets against financial risks, operational breaches and unethical activities by providing employees, contractors, the public, and/or other persons with the appropriate information to report suspected fraud occurring or having effect on the agency, its employees or agents.

Policy: It is the policy of Three Rivers and its employees, agents, and/or associates, to expeditiously report and/or investigate any and all allegations of misconduct and/or fraud. Fraud is defined as “an intentional deception or misrepresentation made by a recipient or a provider with the knowledge that the deception could result in some unauthorized benefit to the recipient or provider or to some other person. It includes any act that constitutes fraud under applicable federal or state law.” KRS 205.8451(2).

Procedure: All employees, officers, and other persons associated with the agency have a duty to report suspicious or fraudulent activity of any employee, officer, vendor, contractor or other person having any association with the agency.

- I. Suspected fraudulent or suspicious activity may be reported to any one or combination of those persons listed on the following list. (This list is intended as a resource only and should not be considered an all-inclusive list. Persons are instructed to contact the person with whom they are most comfortable reporting the allegation).
 - A. First Line Supervisor
 - B. Departmental Manager
 - C. Director
 - D. Board of Health Chairman
 - E. Department for Public Health, Division of Administration and Financial Management
 - F. Cabinet for Health and Family Services, Division of Audits and Investigations
 - G. Commonwealth Office of the Inspector General
 - H. State Auditor
 - I. Or report online at the Anonymous Fraud and Corruption Hotline at https://secure.ethicspoint.com/domain/en/default_reporter.asp or by calling 866-384-4277

- II. Listed below are some examples that may contribute to suspicious or fraudulent activity. (This list is not intended to be all-inclusive, nor is it intended to represent that every act on this list is fraudulent every time.)
 - A. Falsely representing a matter of fact, whether by word or by conduct, or by concealment of that which should have been disclosed.
 - B. Theft of cash or assets belonging to the agency and/or its affiliates and partners.
 - C. Altering or falsifying records.
 - D. Failing to account for monies collected.
 - E. Knowingly providing false information on job applications and requests for funding.

- III. Supervisors or Managers receiving reports of suspicious activity are to immediately escalate the issue for appropriate review and investigation.

- IV. All federal and state retaliatory prohibitions including the whistle blower act shall be strictly adhered to and followed.

District Director

Date

Chairperson, Three Rivers District Board of Health

Date